

1 Patience Milrod  
2 844 N. Van Ness Avenue  
3 Fresno, California 93728  
4 559/442-3111  
5 Fax: 559/442-3164

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8 Attorney for defendants HELMI ZAKI  
9 MANSOUR and AYMAN MANSOUR  
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11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA  
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 DANIEL GREGORY ROSEN,  
18 HELMI ZAKI MANSOUR and  
19 AYMAN MANSOUR,

20 Defendants.  
21

2:98-cr-00171 GEB

22 STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANTS' *AMELINE*  
SUBMITTALS

On August 19, 2005, this Court issued an Order that no later than September 19, 2005 all counsel submit briefing asserting their respective clients' positions as to whether the sentences previously imposed in this case "would have been materially different had the district court known that the Guidelines were advisory." [Order at p. 1, quoting *United States v. Ameline*, 409 F.3d 1073 (9<sup>th</sup> Cir. 2005 [en banc].] To enable counsel for the Mansours to confer with her clients, and pursuant to

1 stipulation of all parties, the Court has granted an extension until October 6, 2005 for  
2 submittal of such briefing.

3 As a result of Ms. Milrod's September 22, 2005 conference with her clients at  
4 the Taft Correctional Institution, she has become aware of several matters which  
5 require extensive additional investigation. In addition, Ms. McNamara requires  
6 time adequately to investigate and prepare her submittal to the Court.

7 For these reasons, the plaintiff UNITED STATES OF AMERICA and  
8 defendants DANIEL GREGORY ROSEN, HELMI ZAKI MANSOUR and AYMAN  
9 MANSOUR hereby agree and stipulate to an order extending the parties' time to  
10 submit the briefing described in the Court's Order of August 19, 2005 to and  
11 through December 19, 2005.

12 IT IS SO STIPULATED.

13 Dated: September 28, 2005

McGREGOR W. SCOTT  
United States Attorney

15 /s/ Samantha Spangler  
16 By SAMANTHA SPANGLER  
Assistant United States Attorney

17 Dated: September 28, 2005

SWANSON & MCNAMARA LLP

18 /s/ Mary McNamara  
19 By MARY MCNAMARA  
Attorney for DANIEL GREGORY  
20 ROSEN

Dated: September 28, 2005

21 /s/ Patience Milrod  
22 PATIENCE MILROD  
Attorney for HELMI ZAKI  
MANSOUR and AYMAN MANSOUR

**[PROPOSED] ORDER**

Having read and considered the stipulation by and between the plaintiff and the defendants, and good cause appearing therefor,

IT IS HEREBY ORDERED that the time for each party's counsel to file and serve briefing as required by this Court's August 19, 2005 Order is extended to and through December 16, 2005.

DATED: September 29, 2005

/s/ Garland E. Burrell, Jr.  
GARLAND E. BURRELL, JR.  
United States District Judge